

July 25, 3003



Floyd DesChamps
Senior Professional Staff Member
Subcommittee on Science, Technology, and Space 227
Hart Senate Office Building
Washington, DC 20510

Dear Mr. DesChamps,

The National Paint and Coatings Association (NPCA) is a voluntary, nonprofit trade association representing some 400 manufacturers of paints, coatings, adhesives, sealants, and caulks, raw materials suppliers to the industry, and product distributors. As the preeminent organization representing the coatings industry in the United States, NPCA's primary role is to serve as ally and advocate on legislative, regulatory and judicial issues at the federal, state, and local levels. In addition, NPCA provides members with such services as research and technical information, statistical management information, legal guidance, and community service project support.

On behalf of the industry, NPCA would like to pledge our support for the Metric-Only amendment for the Fair Packaging and Labeling Act proposed by the National Institute of Standards and Technology (NIST).

NIST and the National Conference of Weights and Measures (NCWM) held a forum in 2002 in response to US Manufacturers request to have the option of only labeling packages with metric units, since it would be more cost efficient and easier to comply with current European Union labeling standards. The forum also discussed implementation strategies that would have a positive market impact. Ultimately, the forum concluded that individual manufacturers would make their own labeling decisions based on the knowledge of customer needs and the demands of their markets.

Currently, our industry is facing pressure on the metric conversion process from the European Union Directive that will not permit inch-pound units on consumer packages after January 1, 2010. This amendment will allow manufacturers to begin adjustments now and will better prepare those businesses that ship products abroad.

Some of our smaller members are concerned that this is the first step to metric convergence. We believe that since this amendment does not create a mandatory requirement, it will allow all our manufacturers to have more flexible labeling options. The proposed amendment has no deadline for conversion, it will not change package fill level or sizes, and it may benefit our manufacturers that export products. If the amendment is adopted, manufacturers would be allowed to meet the current US and European requirements allowing both inch-pound measurements and metric units, or metric only if they choose.

Respectfully Submitted,

Liz A. Johnston
Manager Special Projects; Environment, Health, Safety and International Affairs

